UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

2017 AUG -2 PM 1: 07

UNITED STATES OF AMERICA

Plaintiff

v.

JAMES AMOS HEADLEY,

Defendant.

S Case No.:

SA 1 7 CR 6 0 8 and 115(b)(4), Influencing a Federal Official by Threat;
Count 2: 18 U.S.C. §§115(a)(1)(A) and § 115(b)(4)]

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. §115(a)(1)(B) and 115(b)(4)]

On or about July 11, 2017, in the Western District of Texas, and elsewhere, the Defendant,

JAMES AMOS HEADLEY,

did threaten to murder T.C., a Member of Congress, with intent to impede and intimidate T.C. while he was engaged in the performance of his official duties, and to retaliate against T.C. on account of the performance of his official duties, in violation of Title 18, United States Code, Sections 115(a)(1)(B) and 115(b)(4).

COUNT TWO

[18 U.S.C. §115(a)(1)(A) and 115(b)(4)]

On or about July 11, 2017, in the Western District of Texas, and elsewhere, the Defendant,

JAMES AMOS HEADLEY,

did threaten to murder the immediate family of T.C., a Member of Congress, with intent to impede and intimidate T.C. while he was engaged in the performance of his official duties, and to retaliate against T.C. on account of the performance of his official duties, in violation of Title 18, United States Code, Sections 115(a)(1)(A) and 115(b)(4).

A TRUE BILL

JURY FOREPERSON

RICHARD L. DURBIN, JR. United States Attorney

By:

BETTINA J. RICHARDSON
Assistant United States Attorney